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Subject: WSEC Chpater 12

The proposed new submetering requirements of Table 12-2 and the supporting language should be stricken from the code. If the metering data identified in Table 12-2 is needed it should be obtained using temporary spot metering at the points where it would make the most sense to apply it. Requiring an upfront investment in metering in every building doesn't make sense when there is no associated requirement to utilize the data.

The metering requirements of Table 12-2 have to be achieved by placing electrical loads on to the electrical system in groups that match the metering requirements or by individually metering every load, or by some combination thereof.

Electrical power is effectively delivered from a source to points of use within a facility when a minimal amount of wiring is used, which usually results in the electrical system branching out as close to the load as possible. The proposed metering requirements identify system groups that are not related to physical locations, for example "exhaust fans" instead of 'fans on the third floor". Reconfiguring and branching out the electrical distribution according to the identified metering groups would require significantly more electrical wiring, thereby seriously compromising the goal of efficiently using resources in building construction, and wasting energy on excessive building construction materials. The electrical building codes already require grouping and separation of normal and emergency systems, adding a layer of metering separation on to this would result in an uneconomical number of distribution system feeders and panelboards.

Metering at each load, an alternative to electrical groupings, is possible but would be prohibitively expensive. It doesn't make sense to put a $200 meter on a $200 exhaust fan, but there will arise circumstances where the "code" would mandate such a requirement.

On a statewide scale, placing the proposed metering in every building requires more resources to track what may or may not be a problem, than would ever result from the energy savings that could be derived by reacting to the metering data. The upfront investment in metering will make construction in the state more expensive and compromise the state's ability to economically compete in national and international markets. Temporary spot metering or metering as part of energy audits, is a much more reasonable alternative.